



Dannel P. Malloy
Governor

STATE OF CONNECTICUT
DEPARTMENT OF HOUSING



Evonne M. Klein
Commissioner

TESTIMONY BEFORE THE HOUSING COMMITTEE 2/3/2015

Evonne Klein, Commissioner
Department of Housing

Good afternoon Senator Winfield, Representative Butler and members of the committee. My name is Evonne Klein and I am the Commissioner of the Department of Housing (DOH). Thank you for the opportunity to appear before you regarding several important bills that impact DOH and the constituents we serve.

**DOH Opposes Senate Bill 170 - AN ACT PROTECTING HOUSING FOR SENIOR CITIZENS
and House Bill 5583 - AN ACT CONCERNING HOUSING FOR ELDERLY PERSONS:**

DOH opposes any legislation that would ban or restrict a young disabled person's access to senior disabled housing at this time. Such legislation would undermine DOH's current efforts to seek a viable approach to resolving the concerns that have been brought to our attention from both the young disabled and elderly housing communities. DOH appreciates the complexity of these issues and agrees that it is time to establish a path forward to addressing these matters in a way that effectively serves the needs of both populations.

While the additional resources provided under Governor Malloy's administration for disabled individuals, as well as low-income individuals in general, is achieving progress in expanding housing and support services options, the state is still playing catch up after years of neglect. There is still a shortage of the type of low-cost, accessible housing many young disabled persons need. For this reason, DOH will not support a proposal that decreases the amount of available housing or services for this population.

Staff from DOH and the Department of Mental Health and Addiction Services (DMHAS) have previously discussed the issues underlying these two proposed bills, and DMHAS Commissioner Rehmer and I expect to meet this Friday to discuss them further, as well as steps that can be taken to establish a feasible plan that ensures the needs of both the state's elderly and young disabled populations are addressed. We understand that Commissioner Rehmer has already directed her staff to work with housing authorities to identify specific problems and offer services as appropriate. In partnership with the Connecticut Housing Finance Authority, DOH is compiling data to understand the extent of the problem and will be working fellow state agencies, housing authorities, advocates, and community service providers to create an obtainable plan.

**DOH Supports Senate Bill 405 - AN ACT CONCERNING THE RETENTION OF SECURITY
DEPOSITS FOR AGE-RESTRICTED PUBLIC HOUSING and House Bill 6142 - AN ACT
CONCERNING SECURITY DEPOSITS FOR AGE-RESTRICTED PUBLIC HOUSING:**

As CONN-NAHRO (Connecticut Chapter of the National Association of Housing & Redevelopment Officials) will testify shortly, there was an error during the drafting of these bills. The bills, as they were intended to be drafted, will amend section 47a-22a of the general statutes to enable housing authorities to retain a security deposit from elderly and young disabled tenants until tenancy is ended. Currently, housing authorities must return security deposits to these tenants after one year of occupancy, defeating the purpose

of collecting a deposit. If tenants cause damages, it falls to the housing authorities to utilize their existing resources to conduct repairs. This can lead to the housing authorities implementing rent increases to cover such costs, effectively burdening the other low-income tenants, most of whom do everything they are supposed to do to properly maintain their homes. This legislation relieves these tenants from bearing the costs of those who vacate their apartments in a condition that requires costly repairs. This legislation is another step towards ensuring the financial sustainability of publicly subsidized housing in this state.

However, DOH would not want these security deposits to create a barrier to housing for some of the state's most vulnerable residents. If these bills move forward, DOH respectfully requests that the committee include provisions that would exempt current residents from these new security deposit requirements and would ensure that housing authorities offer flexible payment plans for those potential tenants who cannot afford to make a lump sum deposit at initial occupancy. A security deposit should provide protection to enable a housing authority to remain financially viable; it should not create a barrier to housing for those most in need.

DOH Opposes Senate Bill 408 - AN ACT CONCERNING YOUTH HOMELESSNESS:

DOH opposes Senate Bill 408, not because of its intent, but rather because this legislation is unnecessary. The state has already committed funding for the first statewide homeless youth count in Connecticut, which will be conducted this month through a collaborative effort between housing advocates and state and local partners. Following the count, the state will have a better understanding of the scope of this problem. DOH is aware of the unique needs of homeless youth and the lack of resources currently targeted at addressing these needs. DOH has already begun initial discussions with advocates and fellow state agencies on how to change this.

While the \$1 million committed to the Department of Children and Families to fund crisis response services for homeless youth was an important step, DOH understands that the need for further intervention is critical. DOH plans to collaborate with fellow agencies and community partners in the upcoming months to strategically expand housing and support services options within available resources for homeless youth based on the youth count data.

DOH Opposes House Bill 6132 - AN ACT CONCERNING EMERGENCY POWER IN SENIOR HOUSING COMPLEXES:

The health, safety and welfare of all of Connecticut residents are important to both me and my department. In particular, the needs of some of our most vulnerable residents, those living in state-financed elderly housing, are very important. We encourage all of our local housing authorities and nonprofit and for-profit property owners to prepare and employ Disaster Planning initiatives, including working closely with local emergency management officials to prepare for power outages and identify and communicate emergency services needs when a power outage does occur.

Most of these properties have resident service coordinators whose role includes the identification of community services, including emergency services, and the provision of this information to all residents. Also, most of these properties have on-site community rooms or facilities that have temporary heat and power in the event of an emergency. Those that do not are encouraged to identify other local resources which can be accessed by their residents, and to provide such information to their residents. For these reasons, DOH does not think it is necessary to add a statutory requirement for emergency power generators for housing developments.

In addition, as there is no standard building layout or unit configuration within this portfolio, the production of regulations to describe a wide variety of potential is unrealistic, and would likely lead to confusion, and inappropriate action. The requirement to generate regulations on this issue is unnecessary and has the potential to complicate or delay efforts to address the specific needs of this population group. DOH is committed to continuing to work with all of the department's affordable housing providers, and in particular those serving the state's elderly population, to address the specific needs that best suit their particular environment. Imposing a regulatory obligation would only serve to make this effort more difficult and costly.

DOH Opposes House Bill 6133 - AN ACT CONCERNING THE CREATION OF A FIRST OFFENDER STATUS FOR THOSE ACCUSED OF VIOLATING THE CONNECTICUT FAIR HOUSING LAWS:

DOH opposes House Bill 6133 because it weakens Connecticut's long-standing fair housing laws. Illegal housing discrimination is a problem in this state, just as it is nationally. Victims of housing discrimination are often the most vulnerable individuals and families in the greatest need of housing. When they are prevented from accessing housing opportunities for which they are financially eligible, we see the effects in further segregation and a worsening of income and achievement gaps, and potentially in an increase in housing instability and homelessness. The proposed bill creates a disincentive to take this problem seriously.

DOH Opposes House Bill 6137 - AN ACT STREAMLING THE APPLICATION PROCESS FOR SUBSIDIZED HOUSING:

DOH is not the only subsidized housing provider in the state. There is a wide variety of affordable housing options being developed by a variety of development entities with an even wider array of financing options, regulatory requirements, and tenant selection criteria.

There is no one set of tenant selection criteria, income guidelines, or eligibility criteria for the various housing programs administered in the state: supportive housing, which is targeted to low-income families and individuals with support-service needs; congregate housing, which is housing for persons aged 62 or older with a need for assistance with activities of daily living; affordable housing for moderate, low, and extremely low-income households financed with both state capital subsidies and federal low income housing tax credits; and "workforce housing" and affordable homeownership projects that address the housing needs of moderate income households. To attempt to consolidate this variety of requirements into a single application would be a task of immense proportion for which resources do not currently exist and, in the end, would result in an application too unwieldy for applicants to use.

Also, this would only be the first step in the creation of a centralized statewide wait list. Were it possible to create such an application with standardized criteria, managing such an application pool to generate a waiting list would also be unwieldy and require significant resources to manage. As an example, DOH recently solicited pre-applications for the federally funded Section 8 Housing Choice Voucher and the state Rental Assistance (RAP) programs. To cut down on administrative costs, a single application was used to collect potential applicants. The Department procured a third party consultant to manage advertising/marketing, application receipt and processing, and wait list generation. Over 85,000 applications were received and processed, and two separate wait lists (one for each program) were created from this pool of applicants. The cost to advertise, solicit, collect, and process these applications was approximately \$300,000.

There would be additional costs to manage such a wait list and coordinate with the hundreds of properties and property managers regarding applicant referrals, applicant eligibility, and tenant selection and evaluation. Dispute resolution, appeals hearings, troubleshooting, and compliance management would also be necessary and would require significant new staff resources and administrative costs.

Further, this proposed legislation would have no effect or applicability to units that were funded by other agencies, such as the U.S. Department of Housing and Urban Development, U.S.D.A. – Rural Development, or any non-subsidized units in a mixed income development. Rather than streamlining the process, the proposed legislation would create a costly and confusing process that would not serve prospective tenants, property owners, or the state.

DOH Opposes House Bill 6143 - AN ACT CONCERNING A CENTRALIZED WAIT LIST FOR PUBLIC HOUSING:

House Bill 6143 would allow housing authorities to maintain a wait list for public housing based on the date and time the housing application was received. DOH understands the importance of an equitable and consistent tenant selection process. That is why department staff is scheduling a meeting in March with key stakeholders as a first step in revising the state's fair housing regulations, which includes updating the wait list provisions. The goal of this meeting is to reach a consensus on an approach to selecting tenants that would comply with current fair housing laws, promote equal treatment of applicants, be feasible for housing authorities to administer, and ensure that vulnerable individuals and families receive housing as quickly as possible. DOH opposes H.B. 6143 because it prematurely establishes a tenant selection method that was not vetted through this comprehensive regulation-making process.

Thank you for your time and consideration. I am happy to answer any questions you may have at this time and would also welcome the opportunity to meet with any of you individually if you wish to further discuss these issues.